

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:21-cr-00268-O

MARK A. FORKNER (01)

**UNITED STATES' UNOPPOSED MOTION FOR  
STIPULATED PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States, by and through undersigned counsel, respectfully moves for a stipulated protective order governing discovery, and states in support thereof:

1. The indictment in this case charges the defendant with Fraud Involving Aircraft Parts in Interstate Commerce, in violation of 18 U.S.C. § 38(a)(1)(C), and Wire Fraud, in violation of 18 U.S.C. § 1343.
2. The discovery in this case contains sensitive, proprietary, and confidential financial and business information, the unprotected disclosure of which could create a substantial risk of harm to non-parties.
3. The parties have met and conferred regarding the proposed protective order, and the defendant does not oppose this motion and agrees to the proposed protective order.

Wherefore, the United States respectfully requests that the Court enter the proposed stipulated protective order governing discovery.

Respectfully submitted,

JOSEPH S. BEEMSTERBOER  
Acting Chief, Fraud Section  
Criminal Division  
United States Department of Justice

CHAD E. MEACHAM  
Acting United States Attorney  
Northern District of Texas

By: s/ Cory E. Jacobs  
Cory E. Jacobs, Trial Attorney  
New York Bar No. 4761953  
cory.jacobs@usdoj.gov

Michael T. O'Neill, Assistant Chief  
New York Bar No. 4689782  
michael.t.oneill@usdoj.gov

Scott Armstrong, Trial Attorney  
District of Columbia Bar No. 993851  
scott.armstrong@usdoj.gov

United States Department of Justice  
Criminal Division, Fraud Section  
1400 New York Avenue, N.W.  
Washington, D.C. 20005  
202-514-2000

By: s/ Alex C. Lewis  
Alex C. Lewis, Assistant U.S. Attorney  
Missouri Bar No. 47910  
alex.lewis@usdoj.gov

United States Attorney's Office  
Northern District of Texas  
801 Cherry Street, 17<sup>th</sup> Floor  
Fort Worth, TX 76102  
817-252-5200

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule of Criminal Procedure 47.1(b), I certify that the government met and conferred with the defendant, through counsel, before filing this motion, and that this motion is unopposed and stipulated by the parties.

*s/ Cory E. Jacobs*

Cory E. Jacobs

Trial Attorney, Fraud Section